

1 **SAO**

2 **PATRICK W. KANG, ESQ.**

3 Nevada Bar No.: 010381

4 **ERICA D. LOYD, ESQ.**

5 Nevada Bar No.: 010922

6 **KYLE R. TATUM, ESQ.**

7 Nevada Bar No.: 013264

8 **KANG & ASSOCIATES, PLLC**

9 6480 W. Spring Mountain Road, Suite 1

10 Las Vegas, Nevada 89146

11 P: 702.333.4223

12 F: 702.507.1468

13 *Attorneys for Plaintiff*

14 **UNITED STATES DISTRICT COURT**
15 **DISTRICT OF NEVADA**

16 EDDY CHINCHILLA, an Individual

17 Plaintiff,

18 vs.

19 BELLAGIO, LLC., et al as the employer; and
20 CULINARY WORKERS UNION, LOCAL 226,

21 Defendants.

Case No.: 2:13-cv-01000-GMN-NJK

STIPULATION AND ORDER TO EXTEND

22 **STIPULATION AND ORDER TO EXTEND DEADLINE FOR PLAINTIFF'S RESPONSE TO**
23 **DEFENDANT'S MOTION TO DISMISS**
24 **(SECOND REQUEST)**

25 Plaintiff, EDDY CHINCHILLA, by and through his counsel of record, KANG &
ASSOCIATES, and Defendant Bellagio, LLC., through its counsel of record, KAMER ZUCKER
ABBOTT, and Co-Defendant Culinary Workers' Union through its counsel of record MCCRAKEN,
STEMERMAN & HOLSBERRY hereby stipulate and agree as follows:

...

...

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...

1 Defendant's Culinary Workers' Union, Local 226, and Bellagio LLC., filed separate
 2 Motions to Dismiss on March 5, 2014 and March 6, 2014, respectively. Motions were served to
 3 Plaintiff's counsel on those dates.

4 IT IS HEREBY STIPULATED that Plaintiff is granted an extension of two additional
 5 weeks in which to file responses to each Defendant's Motion to Dismiss up to and including the
 6 date of Friday April 11, 2014.

7 SO STIPULATED.

8 DATED this __28__ day of March, 2014.

DATED this __28__ day of March, 2014.

9 KANG & ASSOCIATES, PLLC

KAMER ZUCKER ABBOTT

11 /s/ Kyle R. Tatum
 12 KYLE R. TATUM, ESQ.
 13 Nevada Bar No.: 13264
 6480 W. Spring Mtn. Rd., Suite 1
 Las Vegas, Nevada 89146

/s/ Edwin A. Keller
 EDWIN A. KELLER, JR., ESQ.
 Nevada Bar No.: 6013
 3000 W. Charleston Blvd., Ste. 3
 Las Vegas, Nevada 89102

14 *Attorneys for Plaintiff*

Attorneys for Defendant Bellagio, LLC.

16 DATED this __28__ day of March, 2014.

17 McCRACKEN, STEMERMAN & HOLSBERRY

19 /s/ Kristin L. Martin
 20 KRISTIN L. MARTIN, ESQ.
 Nevada Bar No.: 7807
 1630 Commerce St., Ste. A-1
 Las Vegas, Nevada 89102

22 *Attorneys for Defendant Culinary*
 23 *Workers Union, Local 226*

ORDER

Pursuant to the stipulation, the foregoing is approved and **IT IS SO ORDERED.**

DATED this ___ day of March, 2014.

By: _____
UNITED STATES DISTRICT JUDGE

Respectfully Submitted by,
KANG & ASSOCIATES, PLLC.

/s/ Kyle R. Tatum
KYLE R. TATUM, ESQ.
Nevada Bar No.: 013264
6480 W. Spring Mtn. Rd., Ste. 1
Las Vegas, NV 89146
702.333.4223
Attorneys for Plaintiff

KANG & ASSOCIATES, PLLC.
6480 W. SPRING MOUNTAIN ROAD, SUITE 1
LAS VEGAS, NV 89146